

EXHIBIT B



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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF ARIZONA

Valentino Dimitrov, individually, and on
behalf of all others similarly situated;

Plaintiff,

vs.

Stavatti Aerospace, Ltd, a Minnesota
corporation; Stavatti Aerospace, Ltd, a
Wyoming corporation; Stavatti
Corporation, a Minnesota corporation;
Stavatti Immobiliare Ltd, a Wyoming
corporation; Stavatti Industries, Ltd, a
Wyoming corporation; Stavatti Niagara,
Ltd., a New York corporation Stavatti
Super Fulcrum, Ltd, a Wyoming
corporation; Stavatti Ukraine, a Ukrainian
business entity; Stavatti Heavy Industries
Ltd, a Hawaii corporation; Christopher
Beskar and Maja Beskar, husband and wife;
Brian Colvin and Corrina Colvin, husband
and wife; John Simon and Jean Simon,
husband and wife; William Mcewen and
Patricia Mcewen, husband wife; Rudy
Chacon and Jane Doe Chacon, husband and
wife; and Does 1 through 10, inclusive,

Defendants.

Case No.: 2:23-CV-00226-PHX-DJH

**DECLARATION OF MORGAN E.
SILVA IN SUPPORT OF MOTION TO
DEEM PLAINTIFF'S OPPOSITION
TO DEFENDANTS MOTION TO
SUMMARY JUDGMENT FOR
PLAINTIFF'S LACK OF STANDING
(DOC. 63) TIMELY AND RESPONSE
TO MOTION TO STRIKE (DOC. 65)**

I, Ross P. Meyer, declare as follows:

2. I am an attorney at Enara Law PLLC (“Enara Law”).

4. After taking over the role, Mr. Meyer began reviewing and updating firm es, such as implementing a quarterly docketing calendar review and a calendar v specific to the firm's cases before this Court.

6. During that review, Mr. Meyer instructed me to review this matter's docket to determine whether an oral argument hearing had been set on Defendants' Motion for Summary Judgment to allow undersigned counsel adequate time to begin preparing for oral argument.

8. Upon an internal review, it was determined that the Firm Manager and an Advanced Certified Paralegal, responsible for docketing all case deadlines, had inadvertently selected Arizona Superior Court Rules instead of the Federal Rules to set the Opposition deadline in the firm's online Clio docketing system. Due to this inadvertent error, the docketed date was set for April 9, 2025.

9. When the Motion to Strike and Reply was filed, Hannah Watts, Enara Law's Assistant, saved the document to this matter's folder in preparation for the oral argument requested by Plaintiff in his Opposition.

10. Ms. Watts notified Mr. Meyer and I that she saved the document to this matter's folder.

11. Upon further review of the circumstances, it became clear that when the Motion to Strike and Reply was filed by Represented Defendants it was classified by this Court in the ‘Docket Text’ section as a Reply to Response to Motion. (the “Notice Email”)


12. Upon review of the Notice Email, I relied on the classification by this Court that the document was a Reply to Mr. Dimitrov's Opposition.

13. On June 6, 2025, I recognized that the ‘Docket Text’ had been amended to include the Motion to Strike. *See* Ex. F. The ‘Docket Text’ now reads as “*Motion to Strike 65 Response to Motion, Reply to Response to Motion. . . *Modified to add motion part on 4/25/2025 (EJA).”

14. At no time did I receive an updated Notice Email modifying the original ‘Docket Text.’

15. I declare under penalty of perjury that the foregoing is true and correct.

DATED this 11th day of May 2025.

By: 
Morgan E. Silva